

EXHIBIT A

HILL & ASSOCIATES, P.C.
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 PHILADELPHIA DISTRICT OF PENNSYLVANIA

Attorneys for Plaintiff

Craig Lugo	:	COURT OF COMMON PLEAS
Plaintiff	:	PHILADELPHIA
vs.	:	CIVIL TRIAL DIVISION
AMAZON.COM.DEDC, LLC	:	JUNE TERM, 2022
Defendant	:	NO.

CIVIL ACTION-COMPLAINT
NEGLIGENCE-PREMISES LIABILITY 2S

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CONNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
 Lawyer Referral and Information
 One Reading Center
 Philadelphia, PA 19107
 (215) 238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociacion De Licenciado De Filadelfia
 One reading Center
 Filadelfia, PA 19107
 Telefono: (215) 238-1701

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MAJOR JURY

Attorneys for Plaintiff

Craig Lugo	:	COURT OF COMMON PLEAS
2526 N. Front Street, Apt 2.	:	PHILADELPHIA
Philadelphia PA, 19133	:	
Plaintiff	:	CIVIL TRIAL DIVISION
	:	
vs.	:	JUNE TERM, 2022
	:	
AMAZON.COM.DEDC, LLC	:	NO.
251 Little Falls Drive	:	
Wilmington, DE 19808	:	
Defendant	:	

CIVIL ACTION-COMPLAINT
NEGLIGENCE-PREMISES LIABILITY 2S

1. Plaintiff, Craig Lugo, is an adult individual, citizen and resident of the Commonwealth of Pennsylvania, County of Philadelphia, residing therein at the address shown in the caption.
2. Defendant Amazon.com.dedc, LLC is a corporation that is licensed to conduct and regularly conducts business in the Commonwealth of Pennsylvania, County of Philadelphia, with a principal place of business at the address shown in the caption.
3. Defendant Amazon.com.dedc, LLC leased, occupied, operated and controlled the property located at 500 American Avenue, King of Prussia, PA 19406 on October 10, 2020.

4. Defendant Amazon.com.dedc, LLC leased, occupied, operated and controlled the property located at 500 American Avenue, King of Prussia, PA 19406 on October 10, 2020 pursuant to a lease agreement with 500 American Avenue Partners, L.P.
5. On or about October 10, 2020, maintenance and/or repair of the premises located at 500 American Avenue, King of Prussia, PA, including all sidewalks, curbs, exterior walkways, ramps and exterior lighting were the responsibility of the Defendant.
6. On or about October 10, 2020, Plaintiff was walking on the premises when he suddenly and unexpectedly fell due to the poor exterior lighting conditions in the parking lot and a dangerous and/or defective condition existing on the common area walkway, namely an unmarked and/or otherwise unapparent elevation change, thereby causing Plaintiff to trip and sustain serious and permanent injuries to his left leg, which required surgery.

COUNT I
NEGLIGENCE

7. Plaintiff hereby incorporates by reference hereto, paragraphs 1-6, inclusively, as if the same were fully set forth herein at length.
8. The aforementioned incident was caused solely by the negligence of the Defendant in failing to properly maintain the premises which negligence consisted of the following:
 - (a) failing to properly inspect, discover and remedy the defective lighting condition and elevated condition of the common area, which the Defendant knew or reasonably should have known existed prior to the time of Plaintiff's fall;

- (b) failing to warn persons expected to be using the area of the dangerous conditions which existed; and
- (c) allowing a dangerous and hazardous condition to exist on, of and/or about the subject premises.

9. At all times mentioned herein, Plaintiff acted with due care and was not contributorily negligent.

10. As a result of the aforementioned incident, Plaintiff was caused to sustain serious and permanent injuries including but not limited to injuries to his lower extremity, which have caused and will continue to cause him a great deal of embarrassment, humiliation, pain, suffering, agony, inconvenience, scarring, and which may be permanent in nature and character.

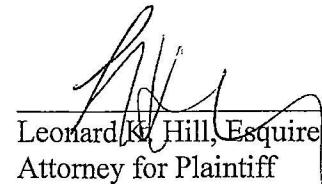
11. As a result of the aforementioned incident and resulting injuries, Plaintiff has been caused to expend various sums of money for medicine and medical attention for treatment and/or cure of these injuries and to have essential services performed during the duration of the physical impairment, all to great financial detriment and loss and expects to pay additional sums of money for medicine and medical attention in the future all to Plaintiff's great financial detriment and loss.

12. As a further result of the aforementioned incident and resulting injuries, Plaintiff has been prevented from attending to his usual and customary duties, vocation and occupations all to his great financial detriment and loss.

Wherefore, Plaintiff, Craig Lugo, hereby demands judgment against Defendant in an amount in excess of Fifty Thousand (\$50,000.00) Dollars.

Respectfully Submitted,
HILL & ASSOCIATES, P.C.

By:


Leonard K. Hill, Esquire
Attorney for Plaintiff

Dated: June 24, 2022

VERIFICATION

The undersigned states that he/she is the plaintiff herein and verifies that the statements made in the foregoing Complaint-Civil Action is true and correct to the best of his/her knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Signature Craig Lugo
 Print Name Craig Lugo